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9 Attorney for Plaintiff,
10 **DIGITECH IMAGE TECHNOLOGIES, LLC**

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

13 DIGITECH IMAGE TECHNOLOGIES, LLC,

14 Plaintiff,
15 v.

16 ELECTRONICS FOR IMAGING, INC.;
17 KONICA MINOLTA HOLDINGS, INC.;
18 KONICA MINOLTA HOLDINGS U.S.A.,
19 INC.; KONICA MINOLTA BUSINESS
20 SOLUTIONS, U.S.A., INC. and XEROX
21 CORPORATION

22 Defendants.

Case No.: SACU 12-1324 JUS (RNBx)

**COMPLAINT FOR INFRINGEMENT OF
U.S. PATENT NO. 6,128,415**

DEMAND FOR JURY TRIAL

Complaint Filed: August 16, 2012
Trial Date: Not Set

COMPLAINT FOR PATENT INFRINGEMENT

23 This is an action for patent infringement in which DIGITECH IMAGE TECHNOLOGIES,
24 LLC submits this Original Complaint against Defendants named herein, namely ELECTRONICS
25 FOR IMAGING, INC.; KONICA MINOLTA HOLDINGS, INC.; KONICA MINOLTA
26 HOLDINGS U.S.A., INC.; KONICA MINOLTA BUSINESS SOLUTIONS, U.S.A., INC. and
27 XEROX CORPORATION (collectively "Defendants"), as follows:

THE PARTIES

1 1. DIGITECH IMAGE TECHNOLOGIES, LLC (“DIGITECH” or “Plaintiff”) is a
2 California limited liability company with a place of business at 500 Newport Center Drive, Suite
3 700, Newport Beach, CA 92660.

4 2. On information and belief, ELECTRONICS FOR IMAGING, INC. (hereinafter
5 “EFI”) is a Delaware corporation with a place of business at Foster City, CA.
6

7 3. On information and belief, KONICA MINOLTA HOLDINGS, INC. is a foreign
8 company with a place of business at Tokyo, Japan and KONICA MINOLTA HOLDINGS U.S.A.,
9 INC. and KONICA MINOLTA BUSINESS SOLUTIONS, U.S.A., INC. are New Jersey and New
10 York corporations, respectively, with places of business at Ramsey, NJ. Hereinafter, KONICA
11 MINOLTA HOLDINGS, INC., KONICA MINOLTA HOLDINGS U.S.A., INC. and KONICA
12 MINOLTA BUSINESS SOLUTIONS, U.S.A., INC. are collectively referred to as “KONICA
13 MINOLTA.”
14

15 4. On information and belief, XEROX CORPORATION (hereinafter “XEROX”) is a
16 New York corporation with a place of business at Norwalk, CT.
17

18 **JURISDICTION AND VENUE**

19 5. This action arises under the patent laws of the United States, Title 35 of the United
20 States Code. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

21 6. On information and belief, the Defendants are subject to this Court’s specific and/or
22 general personal jurisdiction, pursuant to due process and/or the California Long Arm Statute, due at
23 least to their substantial business in California, including related to the infringements alleged herein.
24 Further, on information and belief, Defendants have, within this forum, engaged in at least the
25 selling of the accused products listed herein. In addition, Defendants induce infringement of the
26 patent-in-suit by sellers and/or infringing users located in this forum. Further, on information and
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1 belief, all Defendants have interactive websites which are used in and/or accessible in this forum.
2 Further, on information and belief, Defendants regularly conduct and/or solicit business, engage in
3 other persistent courses of conduct, and/or derive substantial revenue from goods and services
4 provided to persons and/or entities in California.

5 7. Venue is proper in this district under 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b).
6 Without limitation, on information and belief, Defendants are subject to personal jurisdiction in this
7 district. On information and belief, the Defendants are subject to this Court's specific and/or general
8 personal jurisdiction, pursuant to due process and/or the California Long Arm Statute, due at least to
9 their substantial business in this district, including related to the infringements alleged herein.
10 Further, on information and belief, Defendants have, within this forum, engaged in at least the
11 selling of the accused products listed herein. In addition, Defendants induce infringement of the
12 patent-in-suit by sellers and/or infringing users located in this forum. Further, on information and
13 belief, the above listed Defendants have interactive websites which are used in and/or accessible in
14 this forum. Further, on information and belief, Defendants regularly conduct and/or solicit business,
15 engage in other persistent courses of conduct, and/or derive substantial revenue from goods and
16 services provided to persons and/or entities in California.
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20 **JOINDER**

21 8. On information and belief, joinder of these Defendants is proper under 35 U.S.C. §
22 299, at least due to KONICA MINOLTA, and XEROX selling and/or offering for sale products all
23 containing EFI digital print controllers.

24 9. In addition, on information and belief, joinder of these Defendants is proper under 35
25 U.S.C. § 299, at least because questions of fact common to all Defendants will arise in this action
26 due to EFI's digital print controllers being incorporated in all of KONICA MINOLTA and
27
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1 XEROX's products. DIGITECH's rights to relief against Defendants depend upon the same
2 transactions and occurrences related to the making, using, offering for sale and/or selling of the
3 accused products.

4 **COUNT I**

5 **INFRINGEMENT OF U.S. PATENT NO. 6,128,415**

6
7 10. United States Patent No. 6,128,415 ("the '415 patent"), entitled "DEVICE
8 PROFILES FOR USE IN A DIGITAL IMAGE PROCESSING SYSTEM," issued on October 3,
9 2000.

10 11. DIGITECH is the present assignee of the entire right, title and interest in and to the
11 '415 patent, including all rights to sue for past and present infringement and to recover all damages
12 therefor. Accordingly, DIGITECH has standing to bring this lawsuit for infringement of the '415
13 patent.
14

15 12. The various claims of the '415 patent cover, *inter alia*, a device profile for describing
16 properties of a device in a digital image reproduction system to capture, transform or render an
17 image, said device profile comprising: first data for describing a device dependent transformation of
18 color information content of the image to a device independent color space; and second data for
19 describing a device dependent transformation of spatial information content of the image in said
20 device independent color space.
21

22 13. On information and belief, EFI has been and now is infringing the '415 patent by
23 actions comprising making, using, importing, selling and/or offering to sell products comprising a
24 device profile for describing properties of a device in a digital image reproduction system to capture,
25 transform or render an image, said device profile comprising: first data for describing a device
26 dependent transformation of color information content of the image to a device independent color
27 space.
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1 space; and second data for describing a device dependent transformation of spatial information
2 content of the image in said device independent color space.

3 14. DIGITECH reserves the right to take discovery regarding EFI's prior notice
4 regarding the '415 patent. On information and belief, once EFI received notice of the '415 patent, at
5 a minimum by virtue of this suit, its actions necessarily constitute active inducement of at least
6 CANON INC., CANON BUSINESS SOLUTIONS, INC. and CANON U.S.A., INC. (collectively
7 "CANON"); KONICA MINOLTA; RICOH COMPANY, LTD. and RICOH AMERICAS
8 CORPORATION (collectively "RICOH") and XEROX, who are known to perform the infringing
9 acts alleged herein. Such inducement necessarily involves EFI's intent to induce such infringement
10 and/or knowledge of at least a high probability that the infringing acts that it aids, abets and/or
11 encourages constitute infringement of the '415 patent., to make infringing products and/or users to
12 use infringing products. Upon information and belief, such induced infringement has occurred at
13 least since this Defendant became aware of the '415 patent.
14

15 15. DIGITECH reserves the right to take discovery regarding EFI's prior notice
16 regarding the '415 patent. On information and belief, once EFI received notice of the '415 patent, at
17 a minimum by virtue of this suit, its actions necessarily constitute contributory infringement relative
18 to at least CANON, KONICA MINOLTA, RICOH and XEROX. Without limitation, on
19 information and belief, EFI offers to sell and sells within the United States or imports into the
20 United States components (see list below) of the patented apparatuses and/or processes (see at least
21 the products of CANON, KONICA MINOLTA, RICOH and XEROX listed herein) which constitute
22 a material part of the invention of the '415 patent. Further, on information and belief, once EFI
23 received notice of the '415 patent, at a minimum by virtue of this suit, it necessarily knows that such
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1 controllers are especially made or especially adapted for use in an infringement of the '415 patent,
2 and not a staple article or commodity of commerce suitable for substantial noninfringing use.

3 16. Upon present information and belief, EFI's infringing products comprise at least the
4 following accused products: X2 line (including but not limited to X2, X2e, X2-W and X2-CP), X3
5 line (including but not limited to X3e), X4 line, Z4 line, Z5 line, Z9 line, Z16 line and Z18 line.
6

7 17. EFI is thus liable for infringement of the '415 patent pursuant to 35 U.S.C. § 271.

8 18. On information and belief, KONICA MINOLTA has been and now is infringing the
9 '415 patent by actions comprising making, using, importing, selling and/or offering to sell products
10 comprising a device profile for describing properties of a device in a digital image reproduction
11 system to capture, transform or render an image, said device profile comprising: first data for
12 describing a device dependent transformation of color information content of the image to a device
13 independent color space; and second data for describing a device dependent transformation of spatial
14 information content of the image in said device independent color space.
15

16 19. DIGITECH reserves the right to take discovery regarding KONICA MINOLTA's
17 prior notice regarding the '415 patent. On information and belief, once KONICA MINOLTA
18 received notice of the '415 patent, at a minimum by virtue of this suit, its actions necessarily
19 constitute active inducement of resellers and/or users who are known to perform infringing sales,
20 offers for sale and/or uses of KONICA MINOLTA's infringing products. Such inducement
21 necessarily involves KONICA MINOLTA's intent to induce such infringement and/or knowledge of
22 at least a high probability that the infringing acts that it aids, abets and/or encourages constitute
23 infringement of the '415 patent.
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26 20. Upon present information and belief, KONICA MINOLTA's infringing products
27 comprise at least the following accused products: bizhub Pro C65HC, bizhub C6000L, bizhub PRO
28

1 1051, bizhub PRO 1200, bizhub PRO 1200P, bizhub PRO 950, bizhub C6000, bizhub PRESS
2 C7000, bizhub PRESS C7000P, bizhub PRESS C70hc, bizhub PRESS C8000, bizhub C754, bizhub
3 C654, bizhub C652DS, bizhub C452, bizhub C552DS, bizhub C552, bizhub C652, bizhub C360,
4 bizhub C280 and bizhub C220.

5
6 21. KONICA MINOLTA is thus liable for infringement of the '415 patent pursuant to 35
7 U.S.C. § 271.

8 22. On information and belief, XEROX has been and now is infringing the '415 patent by
9 actions comprising making, using, importing, selling and/or offering to sell products comprising a
10 device profile for describing properties of a device in a digital image reproduction system to capture,
11 transform or render an image, said device profile comprising: first data for describing a device
12 dependent transformation of color information content of the image to a device independent color
13 space; and second data for describing a device dependent transformation of spatial information
14 content of the image in said device independent color space.
15

16 23. DIGITECH reserves the right to take discovery regarding XEROX's prior notice
17 regarding the '415 patent. On information and belief, once XEROX received notice of the '415
18 patent, at a minimum by virtue of this suit, its actions necessarily constitute active inducement of
19 resellers and/or users who are known to perform infringing sales, offers for sale and/or uses of
20 XEROX's infringing products. Such inducement necessarily involves XEROX's intent to induce
21 such infringement and/or knowledge of at least a high probability that the infringing acts that it aids,
22 abets and/or encourages constitute infringement of the '415 patent.
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24

25 24. Upon present information and belief, XEROX's infringing products comprise at least
26 the following accused products: 700 Digital Color Press, 700i Digital Color Press, Color 550, Color
27 560, WorkCentre 7755, WorkCentre 7765 and WorkCentre 7775.
28

1 25. XEROX is thus liable for infringement of the '415 patent pursuant to 35 U.S.C. §
2 271.

3 26. As a result of Defendants' infringing conduct, Defendants have damaged
4 DIGITECH. Defendants are liable to DIGITECH in an amount that adequately compensates
5 DIGITECH for their infringement, which, by law, can be no less than a reasonable royalty.
6

7 27. On information and belief, all Defendants have at least had constructive notice of the
8 '415 patent by operation of law.

9
10 **PRAYER FOR RELIEF**

11 WHEREFORE, DIGITECH respectfully requests that this Court enter:

12 1. A judgment in favor of DIGITECH that Defendants have infringed, directly and/or
13 indirectly, the '415 patent;

14 2. A judgment that the Defendants' infringement is and/or has been willful and
15 objectively reckless;

16 3. A permanent injunction enjoining Defendants, and their officers, directors,
17 employees, agents, affiliates and all others acting in active concert therewith from infringing the
18 '415 patent;
19

20 4. A judgment and order requiring all Defendants to pay DIGITECH its damages, costs,
21 expenses, and prejudgment and post-judgment interest for Defendants' infringement of the '415
22 patent as provided under 28 U.S.C. § 284;

23 5. An award to DIGITECH for enhanced damages as provided under 35 U.S.C. § 284;
24

25 6. A judgment and order finding that this is an exceptional case within the meaning of
26 35 U.S.C. § 285 and awarding to DIGITECH its reasonable attorneys' fees;

27 7. Any and all other relief to which DIGITECH may show itself to be entitled.
28

DEMAND FOR JURY TRIAL

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Dated: August 16, 2012

Respectfully submitted,

COLLINS, EDMONDS, POGORZELSKI,
SCHLATHER & TOWER, PLLC



John J. Edmonds

Attorney for Plaintiff
DIGITECH IMAGE TECHNOLOGIES, LLC

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) DIGITECH IMAGE TECHNOLOGIES, LLC		DEFENDANTS (See Attachment)	
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) JOHN J. EDMONDS, COLLINS EDMONDS POGORZELSKI SCHLATHER & TOWER, PLLC, 1851 EAST FIRST STREET, SUITE 900, SANTA ANA, CA 92705, TELEPHONE: (951) 708-1237		Attorneys (If Known)	

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:33%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:33%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td align="center"><input type="checkbox"/> 1</td> <td align="center"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td align="center"><input type="checkbox"/> 4</td> <td align="center"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td align="center"><input type="checkbox"/> 2</td> <td align="center"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td align="center"><input type="checkbox"/> 5</td> <td align="center"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td align="center"><input type="checkbox"/> 3</td> <td align="center"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td align="center"><input type="checkbox"/> 6</td> <td align="center"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	PTF	DEF		PTF	DEF																				
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.)

☒ 1 Original Proceeding
 ☐ 2 Removed from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from another district (specify): _____
 ☐ 6 Multi-District Litigation
 ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: **JURY DEMAND:** ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT:** \$ _____

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 PATENT INFRINGEMENT 35 U.S.C. §§ 271

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input checked="" type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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FOR OFFICE USE ONLY: Case Number: _____

SACV12-01324 JVS (RNBx)

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

If yes, list case number(s):

If yes, list case number(s): 8:12-cv-001153-MLG

(Check all boxes that apply)

- ☐ A. Arise from the same or closely related transactions, happenings, or events; or
- ☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☒ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- ☒ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.

☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
PLAINTIFF (ORANGE COUNTY)	

☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	SEE ATTACHMENT

Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Orange County	

Note: In land condemnation cases, use the location of the tract of land involved

Date

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Nature of Suit	Code	Abbreviation	Substantive Statement of Cause of Action
1. Breach of contract	1		
2. Tort	2		
3. Real property	3		
4. Personal injury	4		
5. Business	5		
6. Family	6		
7. Criminal	7		
8. Other	8		

861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for “Black Lung” benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child’s insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))

PARTY

CONNECTION

(List the names of all such parties and identify their connection and interest.)

ELECTRONIC FOR IMAGING, INC.;	DEFENDANT
KONICA MINOLTA HOLDINGS, INC.;	DEFENDANT
KONICA MINOLTA HOLDINGS, USA., INC.;	DEFENDANT
KONICA MINOLTA BUSINESS SOLUTIONS, USA., INC.;	DEFENDANT
and	
XEROX CORPORATION	DEFENDANT

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.

- Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

LIST OF DEFENDANTS IN THEIR COUNTIES AND STATES BELOW:

ELECTRONICS FOR IMAGING, INC.; SAN MATEO COUNTY, CALIFORNIA

KONICA MINOLTA HOLDINGS U.S.A., INC.; BERGEN COUNTY, NEW JERSEY

KONICA MINOLTA BUSINESS SOLUTIONS, U.S.A., INC.; BERGEN COUNTY, NEW JERSEY

XEROX CORPORATION; FAIRFIELD COUNTY, CONNECTICUT

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.

- ☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

LIST OF DEFENDANTS IN THEIR FOREIGN COUNTRY BELOW:

KONICA MINOLTA HOLDINGS, INC.; TOKYO, JAPAN

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge James V. Selna and the assigned discovery Magistrate Judge is Robert N. Block.

The case number on all documents filed with the Court should read as follows:

SACV12- 1324 JVS (RNBx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

===== :
NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☐ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

Name & Address:

JOHN J. EDMONDS (STATE BAR NO. 274200)
 COLLINS, EDMONDS, POGORZELSKI,
 SCHLATHER & TOWER, PLLC
 1851 EAST FIRST STREET, SUITE 900
 SANTA ANA, CA 92705

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

DIGITECH IMAGE TECHNOLOGIES, LLC

CASE NUMBER

PLAINTIFF(S)

SACV12-01324 JVS (RNBx)

v.

ELECTRONICS FOR IMAGING, INC.; (see attachment)

SUMMONS

DEFENDANT(S).

TO: DEFENDANT(S):

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, John J. Edmonds, whose address is 1851 East First Street, Suite 900, Santa Ana, California 92705. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: AUGUST 16, 2012By: N. BOE
Deputy Clerk

(Seal of the Court)



[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

PARTY

CONNECTION

(List the names of all such parties and identify their connection and interest.)

ELECTRONIC FOR IMAGING, INC.;	DEFENDANT
KONICA MINOLTA HOLDINGS, INC.;	DEFENDANT
KONICA MINOLTA HOLDINGS, USA., INC.;	DEFENDANT
KONICA MINOLTA BUSINESS SOLUTIONS, USA., INC.;	DEFENDANT
and	
XEROX CORPORATION	DEFENDANT